

January 30, 2006

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: WT Docket No. 94-102
Reporting Requirements of DA 05-200
Northeast Communications of Wisconsin, Inc. d/b/a Cellcom

Dear Ms. Dortch:

Pursuant to Commission Order DA 05-200 in WT Docket No. 94-102, Northeast Communications of Wisconsin, Inc. ("Cellcom") hereby files its February 1, 2005 Status Report.

1. Number and status of Phase II requests from PSAPs
 - Number of counties in which Cellcom provides service = 22
 - Number of counties that have not requested Phase II = 8
 - Number of requests received = 14
 - Number of requests considered invalid = 0
 - Number of counties where Cellcom has implemented Phase II = 11
 - Number of counties with implementation date scheduled = 3
2. Estimated dates on which Phase II service will be available to PSAPs served by Cellcom's network
 - Cellcom has already implemented Phase II service in the following eleven counties: Brown, Calumet, Lincoln, Marathon, Outagamie, Portage, and Winnebago (all Wisconsin); and Delta, Dickinson, Houghton, and Marquette (all Michigan).
 - Cellcom is scheduled to provide Phase II service to the following three counties (all Wisconsin) on the dates listed: Door (2/28/06), Manitowoc (1/31/06), and Marinette (12/31/06). **NOTE:** Cellcom is currently ready to turn Phase II service on in all three of these counties. The reason for the delay is that the PSAPs are not ready to receive and utilize Phase II data. Marinette County had repeatedly delayed the implementation date so the date listed is just a guess as to when they will actually be ready to go. They have repeatedly missed the deadlines they have asked for in their requests and subsequent updates.
 - Cellcom is prepared to implement Phase II service within six months of receipt of a valid request from **any** county that is served by Cellcom's network. Since the county determines that date, it is impossible for Cellcom to know the estimated

date for which Phase II service will be available for a specific county where Cellcom has yet to receive a request.

- The counties included an estimated date as to when they would be ready for Phase II service in their E911 grant applications to the state of Wisconsin. In Cellcom's waiver request, a table showing these estimated dates was provided as Exhibit 5 (attached hereto).
3. Status of its coordination efforts with PSAPs for alternative ninety-five percent handset penetration dates
 - Cellcom continues to coordinate its E911 efforts with local PSAPs. Most recently, Cellcom notified the 22 PSAPs in its service area of the relief granted to Cellcom by the FCC, what this means for customers in those counties and included a copy of this report.
 4. Efforts to encourage customers to upgrade to location-capable handsets
 - Cellcom continues to offer various aggressive incentive programs to its subscribers, including those subscribers that still use non-compliant handsets. With respect to specific efforts at converting non-compliant handsets, Cellcom undertook two efforts recently that highlight our commitment to attaining a 95% penetration level. The first effort involved sending letters to all analog handset prepaid customers with an offer to upgrade to a digital, compliant handset. The other effort involved converting the handsets that Cellcom provides at no cost to Neighborhood Watch Programs and emergency vehicles.
 5. Extent of subscribers located in areas with analog service only
 - Cellcom currently has no subscribers located in areas with analog service only. All cell sites in its network – except one – have digital capabilities. However, there are subscribers, especially those who use analog 3-watt bag phones, who receive a stronger, clearer analog signal despite the availability of a digital signal.
 6. Percentage of customers with location-capable phones
 - As of January 23, 2006, Cellcom is at 87.1% penetration.
 7. Detailed information on its status in achieving compliance and whether it is on schedule to meet the December 9, 2006 revised deadline
 - Although Cellcom has made substantial strides since mid-2005, it does not expect to continue transitioning customers to compliant handsets at the same rate. Despite all of its efforts, Cellcom still faces obstacles with its analog subscribers and the extended churn rate with respect to non-compliant handsets. Thus, Cellcom will make every effort possible to satisfy its 95% penetration requirement by December 9, 2006, but, at this time, believes it will not meet it.

Should the Commission have any questions on this report, please do not hesitate to contact me at 920-617-7175.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry L. Lueck". The signature is fluid and cursive, with the first name "Larry" and last name "Lueck" clearly distinguishable.

Larry L. Lueck
Manager of Government Relations

cc: Jeff Cohen, Esq., Wireless Telecommunications Bureau

Wisconsin's E911 Implementation Schedule¹

| County | Phase I Impl. Date | Phase II Impl. Date |
|--------------------|--------------------|---------------------|
| Adams | 3Q 2007 | 3Q 2007 |
| Ashland | 4Q 2006 | 4Q 2006 |
| Barron | 4Q 2005 | 4Q 2005 |
| Bayfield | 4Q 2006 | 4Q 2006 |
| Brown | 1Q 2006 | 1Q 2006 |
| Buffalo | 3Q 2007 | 3Q 2007 |
| Burnett | 1Q 2006 | 1Q 2006 |
| Calumet | 4Q 2005 | 4Q 2005 |
| Chippewa | 1Q 2006 | 1Q 2006 |
| Clark | 1Q 2006 | 1Q 2006 |
| Columbia | 1Q 2006 | 1Q 2006 |
| Crawford | 4Q 2005 | 4Q 2005 |
| Dane | September 2005 | September 2005 |
| Dodge | April 2006 | April 2006 |
| Door | January 2006 | January 2006 |
| Douglas | 3Q 2005 | 3Q 2005 |
| Dunn | 1Q 2006 | 1Q 2006 |
| Eau Claire | 1Q 2006 | 1Q 2006 |
| Florence | September 2005 | September 2005 |
| Fond du Lac | January 2005 | January 2005 |
| Forest | January 2006 | January 2006 |
| Grant | 1Q 2006 | 1Q 2007 |
| Green | November 2006 | November 2006 |
| Green Lake | 4Q 2006 | 4Q 2006 |
| Iowa | 4Q 2006 | 4Q 2006 |
| Iron | | |
| Jackson | September 2005 | September 2005 |
| Jefferson | December 2005 | December 2005 |
| Juneau | | |
| Kenosha | 4Q 2007 | 4Q 2007 |
| Kewaunee | 3Q 2007 | 3Q 2007 |
| La Crosse | 1Q 2007 | 1Q 2007 |
| Lafayette | 1Q 2006 | 1Q 2006 |
| Langlade | 2Q 2006 | 2Q 2006 |
| Manitowoc | 4Q 2005 | 4Q 2005 |

¹ This information contained in this exhibit was obtained from each PSAP's Wireless 911 Grant Application filed with the Public Service Commission of Wisconsin in which, in part, the PSAP sets forth the date of which it anticipates being Phase I and Phase II ready. To search for each PSAP's Wireless 9111 Grant Application, go to http://psc.wi.gov/apps/erf_search/default.aspx and enter " 05 TR 104: in the Utility/Docket section.

Bold = Counties Cellcom provides service

| | | |
|--------------------|---------------|---------------|
| Marathon | 1Q 2006 | 1Q 2006 |
| Marinette | 2Q 2006 | 2Q 2006 |
| Marquette | 4Q 2006 | 4Q 2006 |
| Menominee | | |
| Milwaukee | 3Q 2005 | 3Q 2005 |
| Monroe | 3Q 2007 | 4Q 2007 |
| Oconto | January 2006 | January 2006 |
| Oneida | June 2006 | June 2006 |
| Outagamie | 4Q 2005 | 4Q 2005 |
| Ozaukee | 2Q 2006 | 2Q 2006 |
| Pepin | 3Q 2006 | 3Q 2006 |
| Pierce | 3Q 2006 | 3Q 2006 |
| Polk | 2Q 2006 | 2Q 2006 |
| Portage | August 2005 | August 2005 |
| Price | 2Q 2006 | 2Q 2006 |
| Racine | June 2005 | June 2005 |
| Richland | 2Q 2006 | 2Q 2006 |
| Rock | 3Q 2006 | 3Q 2006 |
| Rusk | May 2005 | March 2006 |
| St. Croix | July 2006 | July 2006 |
| Sauk | 1Q 2007 | 1Q 2007 |
| Sawyer | 4Q 2005 | 4Q 2005 |
| Shawano | 3Q 2006 | 3Q 2006 |
| Sheboygan | 2Q 2006 | 2Q 2006 |
| Taylor | | |
| Trempealeau | 3Q 2006 | 3Q 2006 |
| Vernon | 1Q 2007 | 1Q 2007 |
| Vilas | November 2005 | November 2005 |
| Walworth | 3Q 2005 | 3Q 2005 |
| Washburn | 4Q 2006 | 4Q 2006 |
| Washington | 4Q 2005 | 4Q 2005 |
| Waukesha | August 2004 | February 2005 |
| Waupaca | 3Q 2006 | 3Q 2006 |
| Waushara | 4Q 2006 | 4Q 2006 |
| Winnebago | 4Q 2005 | 4Q 2005 |
| Wood | 4Q 2006 | 4Q 2006 |

Bold = Counties Cellcom provides service